

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 22-60027-CR-SMITH/VALLE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ELIFAITE PERICLES,

Defendant.

_____ /

URGENT MOTION TO EXTEND DATE FOR SURRENDER OF DEFENDANT

NOW COMES the Defendant, ELIFAITE PERICLES, by and through his undersigned attorney and files this his Urgent Motion to Extend Date for Surrender of Defendant and would state:

1. The Defendant was sentenced in the above cause on August 23, 2022 to a period of incarceration of one year and one day in custody.
2. Over the Government's objection, he was given a "self-surrender" date of September 6, 2022 in Miami, Florida.
3. Prior to sentencing, the Defendant's daughter (date of birth: 2/23/2021) was scheduled for a baptism but it had to be rescheduled due to no fault of the Defendant. It is now scheduled for September 18, 2022 at 3:30 p.m. at All Saints Catholic Church in Sunrise, Florida.
4. When this Honorable Court set the surrender date, undersigned counsel was unaware of the date the baptism was scheduled for.

5. Given the significance of the event for the Defendant's daughter and family, and in light of the minimal extension being sought of the Defendant, it is respectfully requested that this Honorable Court extend the date for the Defendant's surrender until after September 18, 2022.

6. Undersigned counsel has communicated with Assistant United States Attorney Marc Anton. He objects to the relief requested herein.

WHEREFORE the Defendant respectfully requests that this Honorable Court grant his Motion to Extend Date for Surrender until some time after September 18, 2022.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically with the Clerk of the Court this 1st day of September, 2022 via the e-filing portal.

Respectfully submitted,

BARRY E. WITLIN, P.A.

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